

**AFFIDAVIT IN SUPPORT OF COMPLAINT**

I, Tara L. Kelliher, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION**

1. I am a Lieutenant with the Hampden County Sheriff's Department and I am currently assigned to Homeland Security Investigations (HSI) as a Task Force Officer. I have been employed with the Sheriff's Department since April 2000 and have been a Task Force Officer (TFO) since June 2017, and as such, I have received formal training in identifying and investigating violations of state and federal law to include human trafficking and narcotics trafficking. I have written and/or participated in the execution of numerous state and federal search warrants. I have participated in all aspects of human trafficking and narcotics investigations including conducting surveillance, executing searches pursuant to court-ordered search warrants, executing arrests, and participating in court-authorized Title III wiretaps of cellular phones.

2. As a Task Force Officer, I am responsible for initiating, conducting, and participating in criminal investigations involving allegations of various federal laws including drug trafficking, child pornography, human trafficking, and immigration violations. I have received training and gained experience in interviewing techniques, arrest procedures, search and arrest warrant applications, the execution of searches and seizures, and various other criminal laws and procedures. I have conducted and participated in numerous criminal investigations involving human trafficking, child exploitation, immigration violations, and narcotics trafficking.

3. This affidavit is submitted in support of a Criminal Complaint alleging that between January 2016 to approximately 2018 or longer, within the District of Massachusetts and elsewhere, the defendant SHANNON YELINEK, committed violations of Title 18, United States

Code, Section 1594(c), Conspiracy to Commit Sex Trafficking, and 18 United States Code, Section 371, Conspiracy to violate Title 18, Section 1952(a)(2), Interstate Travel to Promote Unlawful Activity (the “Subject Offenses”).

4. The statements contained in this affidavit are based on my personal observations, as well as information obtained from other agents and witnesses, written reports about this investigation that I have received, directly or indirectly, from other law enforcement agents, information gathered from the service of subpoenas, the results of physical and electronic surveillance conducted by law enforcement agents, investigation and analysis by law enforcement agents and analysts and computer forensics specialists, and my experience, training, and background in Homeland Security Investigations.

5. Because this affidavit is being submitted for the limited purpose of securing authorization for the requested Criminal Complaint, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish the necessary foundation for the requested Criminal Complaint.

#### **THE SUBJECT OFFENSES**

6. Title 18, United States Code, Section 1591(a) makes it illegal for anyone knowingly, in or affecting interstate commerce, (1) to recruit, entice, harbor, transport, provide, obtain, or maintain by any means a person, or (2) to benefit, financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of (1) above, knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause the person to engage in a commercial sex act.



7. Title 18, United States Code, Section 1952(a) states: “Whoever travels in interstate or foreign commerce or uses the mail or any facility in interstate or foreign commerce, with intent to—

- (1) distribute the proceeds of any unlawful activity; or
- (2) commit any crime of violence to further any unlawful activity; or
- (3) otherwise promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of any unlawful activity, and thereafter performs or attempts to perform—

(A) an act described in paragraph (1) or (3) shall be fined under this title, imprisoned not more than 5 years, or both; or

(B) an act described in paragraph (2) shall be fined under this title, imprisoned for not more than 20 years, or both, and if death results shall be imprisoned for any term of years or for life.”

8. Title 18, United States Code, Section 1952(b) states: “As used in this section (i) ‘unlawful activity’ means (1) any business enterprise involving gambling, liquor on which the Federal excise tax has not been paid, narcotics or controlled substances (as defined in section 102(6) of the Controlled Substances Act), or prostitution offenses in violation of the laws of the State in which they are committed or of the United States, (2) extortion, bribery, or arson in violation of the laws of the State in which committed or of the United States, or (3) any act which is indictable under subchapter II of chapter 53 of title 31, United States Code, or under section 1956 or 1957 of this title and (ii) the term “State” includes a State of the United States, the District of Columbia, and any commonwealth, territory, or possession of the United States.”

## **STATEMENT OF PROBABLE CAUSE**

### **Introduction and Overview of a Sex Trafficking Enterprise**

9. In or about March 2018, HSI initiated an investigation of William Coleman and others pertaining to possible violations of Title 18 United States Code, Sections 1591, 1952, 2422, and 2421, and conspiracies and attempts to commit those violations. Based on information collected from publicly available websites, commercial databases, witness statements, surveillance observations, documentary evidence, and other information, there is substantial evidence showing that William Coleman has been acting as a pimp to several young adult females engaged in commercial sex and that Shannon YELINEK historically had been acting in concert with him to help him run the sex trafficking enterprise.

10. This affidavit will set forth evidence showing the existence of a sex trafficking enterprise that will be referred to as the “Coleman Enterprise.” YELINEK, for whom a Criminal Complaint is sought, has occupied the role as Coleman’s partner and recruiter in the Enterprise.

### **Role of Yelinek in Coleman Enterprise**

11. Coleman is the pimp and the head of the sex trafficking organization. The world of pimping and prostitution is known as the “game.” There are well-understood rules to the “game,” and pimps usually maintain a strong belief that the rules need to be followed. These rules order the relationships between pimps and between pimps and prostitutes. The rules are based on the unquestioned supremacy of the pimp over the prostitutes working for him, and the rules, which often are arbitrary and strict, are designed keep the prostitutes on edge and fearful. The evidence in this case shows that Coleman maintained this position of supremacy over his sex workers. Coleman and YELINEK supplied drugs to sex workers, engaged in threats and



violence against sex workers, arranged for others to threaten and commit violence against sex workers, transported sex workers to motels in Massachusetts and Connecticut, and traveled to Massachusetts and Connecticut to check on sex workers and to collect money from the prostitution of sex workers.

12. YELINEK has an extensive criminal history. Her record includes three felony drug convictions in Hampden Superior Court and Springfield District Court in 2007, 2013 and 2016. She was also convicted in 2008 in Boston District Court for assault and battery with a dangerous weapon.

13. Publicly available information on Facebook and Instagram indicates YELINEK is the godmother of Coleman's child. Springfield Police arrest reports as well as Hampden County Sheriff Department reports indicate that YELINEK has had a relationship with Coleman going back to 2004. YELINEK has facilitated the running of the Coleman Enterprise by engaging in threats against subordinate sex workers, withholding drugs from subordinate sex workers, delivering drugs to and collecting money from sex workers, recruiting new sex workers, and managing subordinate sex workers in the Coleman enterprise.

#### **Use of Drugs and Addiction**

14. There is evidence that shows that many, if not all, of the young females associated with Coleman and YELINEK are or have been addicted to illegal drugs, including heroin, and that YELINEK had supplied these drugs. I know from my training and experience that drug-addicted women and girls are especially susceptible to becoming victims of sex trafficking. Opioid addiction can be so powerful that obtaining drugs to stave off the pain of withdrawal becomes the first priority in an addict's life. Pimps often use that desperation to control victims,

most often women and girls, and to coerce them into engaging in prostitution for the pimp. I know that supplying, withholding, and manipulating an addict's supply of drugs can constitute "coercion" and the use of force or the threat of force under 18 U.S.C. § 1591. *See United States v. Mack*, 808 F.3d 1074, 1081-83 (6<sup>th</sup> Cir. 2015).

### **Historical Sex Workers**

15. The evidence shows that approximately 20 females have worked for Coleman and/or YELINEK in the last three years. Some of the females have only been identified through stage names used in prostitution advertisements. Some have been identified with their real names.

### **Prostitution Advertisements Posted During 2016-Present**

16. An analysis of advertisements posted on Backpage.com and other websites shows that there are a number of young females connected to Coleman as well as to each other and to the same telephone numbers. This is one piece of evidence that these young females are engaged in a common enterprise headed by Coleman. Backpage.com was an internet website often used by those engaged in the business of prostitution. Backpage was divided into geographic regions, and it was widely known and widely used for prostitution. On January 9, 2017, the United States Senate Permanent Subcommittee on Investigations, Committee on Homeland Security and Governmental Affairs published a report (the "Senate Report") entitled *Backpage.com's Knowing Facilitation of Online Sex Trafficking*. The Senate Report called Backpage.com "the leading online marketplace for commercial sex." It also noted that Backpage.com is "world's second-largest classified advertising website" and that Backpage.com has been aptly called a "hub" for human trafficking.



17. Prostitution advertisements linked to the Coleman Enterprise that appeared on Backpage.com and other websites from the Coleman Enterprise tended to follow well-established patterns. They were, first of all, thinly veiled offers to engage in sex for money. There were typically sexually provocative pictures of the person being advertised. The advertisements contained a means for a customer to set up an appointment, which is called a “date” in the lingo used in the world of human trafficking. The means of contact was usually a cell phone number and is less often an email address. The advertisements sometimes had text that suggested, but did not explicitly state, that the pictured person was willing to engage in sex for money.

18. I know from my training and experience that the cell phone noted in a prostitution advertisement is almost always answered (through calls or texts) by the prostitute herself, her pimp, or a person designated by the pimp to arrange “dates” between the pictured person and the customer.

19. A review of hundreds of online prostitution advertisements, telephone records, Facebook records, Paypal records, Backpage.com records, and other information shows that the prostitution activities of numerous young adult females are connected to Coleman and YELINEK. Further, this evidence shows that the sex work of the women described below takes place in an organized, centralized fashion.

20. The vast majority of the prostitution advertisements summarized below and connected to the Coleman Enterprise contain pictures of the young adult females in sexually provocative poses and/or in a state of being partially clothed. The advertisements typically contain multiple photographs, and it is typical for the photographs to focus on a body part, such

as the buttocks or the breasts. The large majority of these advertisements contain text, and the text makes it clear that sex is being offered. For example, the headline of a number of the advertisements for “Nicole” is “Throat Magician Come to Me & Cum in Me.”

21. Many of the advertisements suggest that the customer can purchase sex from two females, either from the pictured female and another unidentified female, or from two identified females, one or both of whom are pictured. For example, a picture with the text “2 girl sessions” appears in advertisements both for “Roxy” and for “Ali.”

22. Prostitution advertisements connected to the Coleman Enterprise are summarized below, grouped together by the telephone numbers appearing in the advertisements. In most of the advertisements, a stage name is used to describe the female, and where the real name of the female has been listed, that is also listed. Some of the information used to identify the real names have come from Facebook accounts which have been seen publicly, and records of many of those accounts have been obtained through a search warrant. Because the advertisements are segregated by the online websites by geographic region, the commercial sex markets serviced by the females can be identified. Because commercial sex is a face-to-face business, there is a powerful business reason for the geographic regions listed in the advertisements to be accurate. A sex worker is most profitable for the pimp if she is in one place for a given day/night and can serve multiple customers without having to travel long distances between “dates.”

23. The advertisements show that most of the females traveled between Massachusetts and Connecticut, with the vast majority being advertised in the Springfield, Massachusetts and the Hartford, Connecticut areas. This location information in the advertisements is consistent with other information gathered during the investigation.



24. In many cases, the same telephone number has been used for multiple females, indicating that the same telephone number has been passed between females in the Coleman Enterprise. The advertisements also show, in many cases, multiple females advertised together, indicating that customers can have the services of two females together. In some instances, words like “2 girl special” are used to make it explicit that the sexual services of two females can be purchased together. The use of the same telephone number and the advertising of females indicates that the activities are being coordinated and that the females are not operating alone.

25. Backpage.com records have shown that a single Backpage account, the account associated with the roxystewart118@yahoo.com email address (the “roxystewart” account) posted one or more of the Backpage advertisements for most of the telephone numbers summarized below.<sup>1</sup> In most cases, because of the nature of the telephone records or public records available, we have been unable to identify the subscriber for the telephone numbers. Where that information is available, it is listed.

Telephone Number in Advertisements	Stage Name/(Real Name) of Sex Worker(s)	Sex Workers offered together in ads	Time Period	Identified Backpage account used to post ads	States in which ads appeared	Subscriber to telephone number (if available)	Number of Ads
(413) 693-6446	-Sarah (Destiny Klein) -Leslie (Virginia Maldonado) -Nicole (Brianna Lam/LeHenry) -Kayla (Justine Matos) -Ali (Alicia Locke) -Angie	Nicole/Kayla Leslie/Ali Leslie/Nicole Leslie/Sarah	6/15/17-11/29/18	roxystewart Danielle.D73	RI, MA, CT	William COLEMAN	1200+

<sup>1</sup> To be clear, not all of the advertisements associated with each telephone number were posted by the roxystewart account. Some of the advertisements were not posted on Backpage, and the Backpage records did not indicate, in every case, the account which had posted the ads. The records did indicate, that the roxystewart account had posted at least one advertisement for almost all of the telephone numbers.

	-Savannah Rose (Ami Cooper)						
(413) 310-1714	(Shannon Roberts) Sarah (Destiny Klein) Kayla (Justine Matos)	Roberts/Klein Roberts/Matos	12/28/17- 6/8/18 <sup>2</sup>	roxystewart	MA, CT	Ami Cooper	357
(214) 394-2988	(Destiny Klein)		1/29/18- 2/13/18	roxystewart	NV, MA, CT		40
(860) 936-8756	Kayla (Justine Matos) (Shannon Roberts) Roxy (Rachael Gore)	Matos/Roberts Matos/Gore	10/27/17- 6/8/18 <sup>3</sup>	roxystewart	MA, CT		584
(413) 426-0863	(Destiny Klein)		2/25/18- 6/8/18	roxystewart	MA, CT		197
(413) 930-5025	Danielle (Lianessa Rivera)		12/12/16- 12/26/16	roxystewart	MA, CT		61
(413) 685-2149	Pamela (Julie Martone)		4/17/17- 5/27/17	roxystewart	MA, CT		152
(413) 735-3974	Pamela (Julie Martone)		5/25/17- 6/22/17	roxystewart	MA, CT	currently used by COLEMAN	169
(860) 572-6825	Crystal		3/9/17- 3/24/17	roxystewart	MA, CT		71
(413) 275-4397	Buttercup, aka Sonja Smiles, butterfly		6/23/16- 4/26/17	roxystewart	MA, CT		59
(413) 883-3416	Candy		6/23/16- 4/26/17	roxystewart	MA, CT		18
(413) 570-3807	Petite Brunette		5/3/17- 7/31/17	roxystewart	MA		182
(413) 517-5623	Treasure		12/8/17- 1/2/18	roxystewart	MA, CT		18
(413) 930-5301	Kylie (Chelsea Malone) Angie		2/15/17- 6/15/17	roxystewart	MA, CT		492
(413) 222-4208	Nevaeh Arianna Nicole (Brianna Lam/LeHenry)		5/3/17- 7/31/17	roxystewart	MA		98
(857) 417-5111	Lexi (Vanessa Laflamme)		4/5/17- 6/8/17	roxystewart	MA, CT		464
(413) 693-9001	-Sarah (Destiny Klein) -Ali (Alicia Locke)	Sarah/Ali Ali/Nicole	9/6/17- 11/29/18	roxystewart	MA, CT		1100+

<sup>2</sup> The ending date for the use of this telephone number in advertisements does not mean that the number was not used after this date. The online website, skipthegames, has a means for customers to reach sex workers or their pimps through an online messaging service, much like Craigslist employs. This allows communication with the sex worker without placing the telephone number in the advertisement.

<sup>3</sup> The ending date for the use of this telephone number in advertisements does not mean that this number is not being currently used. The online website, skipthegames, has a means for customers to reach sex workers or their pimps through an online messaging service, much like Craigslist employs. This allows communication with the sex worker without placing the telephone number in the advertisement.



	-Nicole (Brianna Lam/LeHenry) -Leslie (Virginia Maldonado) -Alexis (Naysha Marie)	Ali/Leslie Alexis					
(413) 221-3291	Alexis (Naysha Marie)		11/24/17-12/8/17	roxystewart	CT		24
(413) 523-6603	Leslie (Maldonado) Shannon Roberts Destiny Klein	Klein	8/17/17-7/14/18		RI, CT, MA		356
(413) 977-9703	Serenity (Lemelin)		11/3/17-10/24/18		MA, CT		229
(413) 735 3845	Lexi (Vanessa Laflamme)		8/25/18-8/27/18		MA, CT	Number given to Matos by COLEMAN 8/29/18	7
(413) 258-8285	Gianna (Stephanie Bradford)		4/7/17-4/8/2017		CT, Foxwoods		8

### **Facebook Information**

26. Publicly available information on Facebook indicates that Shannon YELINEK has a Facebook page. YELINEK is Facebook friends with a female with the Facebook vanity name of Virginia Maldonado, who is mother of Coleman's child. The Facebook vanity name is often, but is not always the user's real name. From a review of the publicly available pictures on Maldonado's Facebook account, it appears that Maldonado is the female denoted as "Leslie" in the prostitution advertisements. Other information gathered during the investigation, corroborate the fact that Coleman and Maldonado share a child together and YELINEK is the godmother if the child.

27. YELINEK is Facebook friends with a female with the Facebook vanity name of Chelsea Rose. From a review of the publicly available pictures and information on the Facebook account the individual has been identified as Chelsea Malone. It also appears Malone is the female denoted as "Kylie" in the prostitution advertisements. Other information gathered

during this investigation, corroborate the fact that Malone worked for YELINEK as a prostitute.

**Interview of Virginia Maldonado**

28. On January 25, 2019, Virginia Maldonado was interviewed by HSI agents and stated she met William Coleman when he was living on Commonwealth Avenue in Springfield, MA. During this time Coleman was dealing narcotics (oxycodone, cocaine, crack and marijuana) to strippers. Maldonado stated that one of the females overdosed and Coleman was charged with manslaughter. Maldonado stated that YELINEK posted bail for Coleman.

29. Maldonado stated that while Coleman was incarcerated, YELINEK sold drugs for Coleman and gave Maldonado money from the sales. In 2013, Coleman and YELINEK began the "escort service." Maldonado stated that during this time YELINEK would set up the dates, deliver drugs to the sex workers, collect the money from the dates and answer the sex buyers. Maldonado stated that YELINEK eventually went to jail and during one of YELINEK's incarcerations YELINEK recruited a female to come work as a sex worker for Coleman.

**Text messages between YELINEK and Coleman**

30. On June 4, 2018, HSI Agents obtained one Apple iPhone 6S, Model A1688, from the Vernon Police Department, Vernon, Connecticut. This iPhone had been seized by Vernon PD from William Coleman pursuant to his arrest on May 8, 2017. The iPhone was subsequently entered into HSI Springfield custody and a federal search warrant was obtained. Data obtained in response to this search warrant included numerous text messages exchanged between Coleman's phone and YELINEK's phone number, (413) 455-6989. Law enforcement indices queries identified phone number (413) 455-6989 as being registered to Shannon YELINEK of 50 Stevens Terrace, Ludlow, MA. Information received from the Springfield Police Department



confirmed YELINEK had listed phone number (413) 455-6989 as her contact information during a field interview and the contact information for number (413) 455-6989 is “Shan” in the Apple iPhone obtained from the Vernon Police Department. The following text messages were recovered from the seized Apple iPhone:

31. March 16, 2017 11:23

**Yelinek:** Oh ok. So I gave her a bundle and I put an extra bag in it to see if she would say anything Bc u know for sure she would if it was short. Nothing yet. Smh.

**Coleman:** lol, let her know tho

32. March 17, 2017 12:21

**Yelinek:** if u can please post Kim

**Coleman:** ok

**Yelinek:** I told her that bundle had 11. She said ohi it did right I was just about to say something. Smh ya right. But if it was one short she would have said.

**Yelinek:** Then she saw someone and said he pulled her ad up and showed her her pics and I asked why would he do that without u inquiring. She said bc he said he wanted to know if I knew what pictures were posted of me. Bullshit. That don't even make since. He would think she posted them herself. So she's asking clients to show her ad.

**Coleman:** I just cussed her out.

**Yelinek:** I know. You can post both of them.

**Coleman:** posted

**Yelinek:** Post them home Bc were on our way back. Literally no potentials at all for either. It's slow af. I wonder if ppl are their with families or whatever.

**Coleman:** ok

33. March 17, 2017 5:35

**Coleman:** how are the calls

**Yelinek:** way better than the casino

**Yelinek:** they are both with clients I went to the store.

**Coleman:** Ok. They need to start bringing money in.

**Yelinek:** I think they will. They both have a bill so I need to work on that.

**Coleman:** I just smashed the neighbor across the street and she said she use to escort. Yea not good.

**Yelinek:** Really? Fuck yea. Who really cares about her face. Lol

34. March 18, 2017 12:24

**Yelinek:** finally taking Kim on an outcall that was supposed to be for Chelsea.

**Coleman:** I just post Kim but nomore credits.. u gotta bring some type of money here so I can put more credits.. I put that \$500 on the cell bill from casino.

**Yelinek:** ok. Headed to u in a few.

**Coleman:** Kim's reposted.. any more updates on that overnighiter

**Yelinek:** yes, we're going.

**Coleman:** How u gonna get paid.. upfront. She might be fucked up.

**Yelinek:** Half upfront and half at the end. I am going to wait up there and try to get the 1000 before I leave.

**Coleman:** yes, that's a must. All you have to do is hold om to the work and give it to her after you grab the \$1000.



**Yelinek:** ok, Chelsea is good with work still has. So Ima give Kim what I have left after I get the money.

35. March 19, 2017 6:13

**Coleman:** What's the status on clients with Chelsea today

**Yelinek:** She has someone be there in 45 minutes, it seems slow today. I was gna tell u post her again but u just did, lmk when she's posted and gna need work for her when u get home.

**Coleman:** well she gotta see more clients.. she owes a bill.. she usuallu paying off her bill and paying stuff. She didn't text me she was low.

**Yelinek:** I have a \$100 from her and will have the rest later.

**Coleman:** Chelsea said she good on work.

36. March 21, 2017 9:54

**Coleman:** What happen with u reaching out to the girls.. I get response 8 hours later.. this seem part time to u it seems.. what did Chelsea do today, she only got 2 bs last night.. that really business if she only doing 2 bs in the business, that's a normal street person gathering up money to grab that small amount.. u said u was gonna work on it but I/m not hearing or seein anything.. when I take full control I see a lot more money and business.. I paid u more at 20 percent when I had the overall business but I try to let you have a lil freeway and it's not working right.. I need a break down every night on clients and fees.. what's up with Asia or Kim

**Yelinek:** Today was slow for her nut I'm just going to get her now for outcalls and the Spanish girl has another white girl with her young and cute she gna bring, def not part time I do this 24/7. I don't take no breaks

37. March 23, 2017 1:01

**Coleman:** you need some time with the girl.. u can't just come and drive to casino with her like this smh

**Yelinek:** oh I am going to talk to her. Bc she ain't gna think she dictating shit

**Yelinek:** this girl claim she did 2 bundles and she's still sick

**Coleman:** is Chelsea sick, well she ain't doing a bunch of shit for free.. she haven't proven anything yet.

38. March 23, 2017 12:56

**Coleman:** They got rigs 4

**Yelinek:** Can you grab some please. I usually do before we leave but I was rushing and forgot, they have some but can use new ones

**Coleman:** what size

**Yelinek:** 30 gage ½ inch 1CC

**Coleman:** U have my money put aside.. u got a break down on fees what they owe and work money.. ima pick up they money up when I get there,

**Coleman:** about to pull up

**Yelinek:** yes, it's in the car

**Coleman:** what's in the car

**Yelinek:** money, I am getting it now, meet me at Pequot?

**Coleman:** I'm here

39. March 23, 2017 4:40

**Yelinek:** since I have 3 grils post them with time in between

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4 A rig is a slang term for a hypodermic needle used by drug users and drug dealers.



**Coleman:** keep me posted on clients seen tonight.. I don't wanna order work when the phone bill is do tomorrow if they aren't making money

**Yelinek:** ok

40. March 24, 2017 12:58

**Coleman:** what's going on with the girls

**Yelinek:** Kim has a 400 coming. Hasn't seen anyone yet. Chelsea made \$500 destiny 120

**Coleman:** Chelsea made 500 on 2 clients or one

**Yelinek:** 2

**Coleman:** ok.. hopefully kim show up.. I didn't grab work yet I'm holding back because phone bill is do tomorrow.. but it starting out better now

41. March 25, 2017 2:39

**Coleman:** U need to get her grinding a lot harder.. if we get caught up then it should be worth it.. stop being buddy buddy.. it's not working u hurting the money.. she don't gotts worry about stressing work.. every girl does anal if they wanna get high.

**Yelinek:** ok

42. March 25, 2017 10:28

**Coleman:** That's Bri

**Yelinek:** ok, she's ok. Not bad. But potential

43. March 27, 2017 5:53

**Coleman:** yea she had money last night 100 to buy.. she made money today also so grab her money but she gonna get a lil sick before I give her anything

**Yelinek:** ok

**Coleman:** she getting sick yet

**Yelinek:** Yea. She started getting sick earlier. But got an out for her so I have her money and your fees. So if u want to give me to her bring to her for her out. Bc she thinks ur in jersey. Idk why. Did you tell her that.

**Coleman:** yup I did.

**Yelinek:** oh ok bc I didn't question it but I was like wtf?

**Coleman:** yea.. she to spoil so ima make her sweat just like the other girls done

**Yelinek:** ok. That's why I didn't press it but she told me hours ago she was feelin it

**Coleman:** good, do not comfort her..if she's not feeling good then you need to zone it out.. I will see her tonight but later..the process is the brown to keep them making money.

**Yelinek:** I have all the money just FYI

44. March 27, 2017 11:33

**Coleman:** I need a status on how she's feeling etc. etc. u make her come through me to get her shit..

ima break her down and build her up our way.. I blame u but it was the brown but I'm glad u back to normal.. we gotta maximize her the short time she here...

What I want u to tell her is.. wel will will be back around at 1230 but u gotta get him to come see u because it's his work and he did't leave me anything for you

I put 4 bs aside for her.. she will get it tonight. But don't tell her, just say u need to hit will up.

That's gets her outta that being comfortable.. in worc she was a different grind

**Yelinek:** I won't say anything

45. March 28, 2017 1:09



**Coleman:** how can she be so claim and be cool to go all night without shit..u said she was feeling it earlier

**Yelinek:** yep. She said she was feeling shitty

**Coleman:** hmmm... when ppl are shitty they come out of character, she isn't,

I been around tons of sick chicks and they don't be clam

When they sick they sick u know how sick is wtf

You mean her sickness is better than anyone elses

**Yelinek:** last I talk to her I told her to contact u bc u weren't around and didn't leave me anything and she was panicking about doing the outcall being sick

**Coleman:** what you mean panicking, when a bytch is sick they come outta of character

**Yelinek:** She was jus saying omg what I going to do and would u be back before we left. I told her I didn't know she said she was gna try to lay down and sleep it off till then

46. March 28, 2017 12:08

**Coleman:** I'm buying more brown and spending 100 on credits now .. so when she makes money make sure u see me later today and have her grab a few paid bs for her trip and I'll front her the rest

**Yelinek:** Ok. Gotcha

47. March 29, 2017 3:52

**Coleman:** New brown is fire

**Yelinek:** Ok. Oh yea? Good shit

**Coleman:** I got ten subs if u hear anything

**Yelinek:** ok how much 10\$?

**Coleman:** What has Chelsea done today, she's posted

**Yelinek:** 320 and someone coming

**Coleman:** What did she see the last 2 days and how much she got left

**Yelinek:** 850 she said she has enough for her wakeup tomo. But if she can get tonight whe will

**Coleman:** Yea she can..

48. April 3, 2017 10:47

**Coleman:** Chelsea needs new pics.. them pics been there way to long

**Yelinek:** ok

49. April 4, 2017 4:49

**Coleman:** Steph came by.. she still looks good and excited to work with u

Ima promote her heavy starting tomorrow... Chelsea needs new pics tomorrow

**Yelinek:** awesome ok

**Phone number (413)930-5301**

50. The telephone number (413) 930-5301 is listed in prostitution advertisements for the time period February 15, 2017 to June 15, 2017. The advertisements from February 15, 2017 to April 8, 2017 show Chelsea Malone with the stage name "Kylie." The advertisements show the face of Chelsea Malone. The advertisements contains descriptive text, with all of the advertisements containing the following language: "Hello gentleman! My name is Kylie and I'm new in town! Care to make a girl feel at home? That is MY main goal to make sure you are at ease and well taken care of. I am young and full of energy! I am discreet and aim to please. I am very open minded. And love to play and pamper! 100% real photos 5'3, 125 lbs, green eyes, and long sexy red hair I am here to explore and excite! Your time with me is exactly that. ALL



ABOUT YOU, Kylie (413)930-5301.”

51. The advertisements indicate that “Kylie” is 23 years old.

52. The advertisements with the telephone number (413) 930-5301 from February 15, 2017 to April 8, 2017 contain pictures of “Kylie” in sexually provocative poses and/or in a state of being partially clothed. The advertisements contain multiple photographs of “Kylie” and sometimes the photographs focus on a body part, such as the buttocks or the breast.

53. The advertisements with the telephone number (413) 930-5301 are directed to specific geographic areas with the majority of the advertisements split between the Massachusetts and Connecticut markets. This indicates that “Kylie” moved across state lines for servicing different commercial sex markets in Massachusetts and Connecticut.

54. Specifically, the advertisements posted on March 16, 2017 at 12:00pm and March 17, 2017 at 9:07am with the telephone number (413) 930-5301 are directed to the specific geographic area Eastern Ct, FOXWOODS (i.e., Eastern Connecticut and the Foxwoods casino). On March 17, 2017 at 2:14pm the advertisement posted with the telephone number (413) 930-5301 were directed to the specific geographic areas Hartford, Ct, Springfield, MA, and Enfield, Ct.<sup>5</sup>

55. In May 2019, Special Agent (SA) Morizio and Task Force Officer (TFO) Kelliher met with a source of information (SOI) who stated the SOI was introduced to YELINEK by Malone at a methadone clinic. The SOI also stated that Malone has been addicted to illegal drugs (specifically heroin) for several years.

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<sup>5</sup> On March 17, 2017 at 12:21pm, YELINEK texted Coleman to “post both of them” at home because they are on their way back. On March 17, 2017 at 5:35pm Coleman texted YELINEK “how are the calls” and YELINEK responded “way better than the casino.”

**2017 Jail Calls & Text Messages between YELINEK and Coleman Regarding Sex**

**Trafficking**

56. Shannon YELINEK was arrested on a warrant and incarcerated at the Women's Correctional Facility in Chicopee, Massachusetts between approximately April 6, 2017 to October 6, 2017. While incarcerated, YELINEK communicated with Coleman over the inmate phone system over a hundred times. YELINEK refers to Coleman as "Will" and talks to the male about a child named "Lance," who has been identified as the minor son of William Coleman.

57. YELINEK spoke with Coleman about recruiting women from within the facility to work as prostitutes for Coleman after their release. On April 9, 2019, YELINEK stated to Coleman that her roommate gets out in a week and wants to work. YELINEK gave Coleman the name of the woman and told him to look her up on Facebook, so he can see what she looks like. YELINEK told Coleman that this woman is "down for good money." She also informed Coleman of the woman's release date, and Coleman states that he will pick her up. Coleman asked YELINEK how does she look and YELINEK stated "she's a crack head but she can do herself up."

58. During the same conversation YELINEK and Coleman talked about a female named "Chelsea" they said either "dipped" on them or may have possibly overdosed. YELINEK told Coleman that "Chelsea owes her \$800 dollars and that she is going to fuck her up. YELINEK again stated to Coleman, "Be prepared. I am going to set her up then hop on her." Later in the conversation it is mentioned that "she" (referring to Malone) was making a lot of money. YELINEK told Coleman, "I told her she had to do extra shit." YELINEK also stated to



Coleman there are mad girls in here and that she is about to recruit everybody. Coleman told YELINEK that she can network more in population and she stated you know I will.

59. During a conversation on April 9, 2017, Coleman stated to YELINEK that “Steph” went to security and told them her business and she gambled \$900. YELINEK responded to Coleman, “well guess what, when I get home she is going to get pieced the fuck up.”

60. The telephone number (413) 258-8285 is listed in eight prostitution advertisements on Backpage.com for the time period April 7, 2017 to April 8, 2017. The advertisements show Stephanie Bradford with the stage name “Gianna.” The advertisements show the face of Stephanie Bradford. The advertisements contain descriptive text, with all or almost all of the advertisements containing the following language: “My name is GIANNA I’m new to the area and all I want to do is make amazing freaky wet memories with you!!! I won’t be here for long so come get it while it’s hot and wet. I’m strikingly beautiful girl that loves to please. Come tame me please!!! I’m in desperate need. GIANNA 413-258-8285.”

61. All of the advertisements with the (413) 258-8285 telephone number contain pictures of “Gianna” in sexually provocative poses and/or in a state of being partially clothed. The advertisements show multiple photographs of Gianna and sometimes the photographs focus on a body part such as the buttocks or breast.

62. The advertisements with the telephone number (413) 258-8285 are directed to a specific geographic location--Eastern Connecticut, FOXWOODS.

63. While reviewing text messages from the cell phone seized from the Vernon Police Department belonging to Coleman on April 4, 2017, Coleman sent a text message to YELINEK:

“Steph came by.. she still looks good and excited to work with u Ima promote her heavy starting tomorrow.. Chelsea needs new pics tomorrow” YELINEK responded “awesome ok.”

64. While reviewing evidence from the cell phone seized from the Vernon Police Department belonging to Coleman a text from Coleman to Bradford was discovered. On April 11, 2017, Coleman sent a text message to Stephanie Bradford stating, “Shannon said she gonna fuck you up on site.”

65. During a conversation recorded while YELINEK was incarcerated, on April 10, 2017, YELINEK stated to Coleman “Nothing but heroin addicts in here.” Coleman asked who else is leaving soon to go home and told YELINEK she can network more in population.

66. During a conversation on April 12, 2017, Coleman asked YELINEK are there lots of girls in there? Any potentials? YELINEK responded, “Layla, she weighs 130 now. Coleman told YELINEK, “that’s good. 130 is good money. We have to get Layla back on the team. She weighs 130 now. That’s good!” During a later conversation the same day YELINEK told Coleman that Layla has been telling people about her and everyone keeps coming up to her. Coleman stated to YELINEK “The boss lady, the madame.” Coleman asked YELINEK about another girl. YELINEK told Coleman that she has to find her. She is older 43 or 44 and that she is Portuguese with long black hair. Coleman tells YELINEK “that’s good money! Oh yeah!” YELINEK told Coleman that her body is not bad, that she looks Portuguese, Italian, or Spanish, and that she could be anything.

67. In April 2017, YELINEK and Coleman had a conversation about a woman who has been identified as Julie Martone. Martone was arrested at a bus stop on Main Street in Springfield, Massachusetts with two others on heroin-related charges, whose name, street



address and mugshot were posted on MassLive. During the conversation YELINEK and Coleman talked about how Coleman identified the arrested female through MassLive, identified her as a potential recruit, and how MassLive listed her address. On April 13, 2017 during a phone call between YELINEK and Coleman a woman got on the phone and had a conversation with YELINEK. YELINEK told the woman she is Will's best friend, he is reliable, he's "good money," and "we do business in the street together." Coleman got back on the phone and stated to YELINEK that the two of them, Coleman and Martone, had not yet talked "business".

68. Publicly available information on Facebook indicates that Coleman has a Facebook page with the identifiers william.j.coleman.39 and 100001270871929. On April 13, 2017, Coleman communicated with Julie Martone through Facebook messenger. The following messages were obtained from Facebook pursuant to a federal search warrant number 18-mj-3059-KAR:

**Author** William J Coleman (100001270871929)

**Sent** 2017-04-13 16:42:30 UTC

**Body** thats sucks about the bus stop hit with the cops..gotta better way for u love ...

**Author** Julie Martone (100009271939737)

**Sent** 2017-04-13 16:56:19 UTC

**Body** Julie Martone accepted your request.

**Author** Julie Martone (100009271939737)

**Sent** 2017-04-13 16:56:33 UTC

**Body** I no it does.. I am so embarrassed

**Author** William J Coleman (100001270871929)

**Sent** 2017-04-13 16:58:08 UTC

**Body** them cops are fucking dicks..anyways i think we can d0 some buisness...413 304 0992.. if u have time later maybe go grab a drink and talk



**Author**

Julie Martone (100009271939737)

**Sent** 2017-04-13 17:00:54 UTC

**Body** Yeah they are.. No need to put it on news all day an night. Ok that sounds good. Here is my # 4137771438

69. The telephone number (413) 685-2149 is listed in 152 prostitution advertisements for the time period April 17, 2017 to May 27, 2017, with 148 of the advertisements appearing on Backpage.com. The advertisements all show Julie Martone with the stage name of "Pamela." The advertisements show the face of Julie Martone. The advertisements contain descriptive text, with all or almost all of the advertisements containing the following language: "I'm a bit older, some reviews say I'm bolder. Cuddlin', kissin' I'm sure you'll approve me." The advertisements show the face of "Pamela."

70. The advertisements indicate that "Pamela" is 39 or 40.

71. All of the advertisements with the (413) 685-2149 telephone number contain pictures of "Pamela" in sexually provocative poses and/or in a state of being partially clothed. The advertisements contain multiple photographs of "Pamela," and sometimes the photographs focus on a body part, such as the buttocks or the breasts.

72. The advertisements with telephone number (413) 685-2149 are directed to specific geographic areas with all or almost all of the advertisements split between the Springfield, MA and Hartford, CT markets. This indicates that "Pamela" moved across state lines for servicing different commercial sex markets in Massachusetts and Connecticut.

73. Backpage.com records show that several advertisements for "Pamela" and the telephone number (413) 685-2149 were submitted by the user account with the email address roxystewart118@yahoo.com.

74. On April 13, 2017, YELINEK told Coleman on Tuesday she has a girl from Worcester for him that is good money. YELINEK told Coleman she gave her his number and again told him she is good money.

75. On April 14, 2017, YELINEK talked to Coleman about her current cellmate who gets out on Wednesday and wants to work weekends at the casino. YELINEK told Coleman the girl is older but can hustle and will work Friday through Sunday all day and all night. YELINEK told Coleman she is from Worcester and she gave her Coleman's phone number. YELINEK told Coleman when she gets out of jail she will pick her up in Worcester and drop her off on Friday and pick her back up on Sunday because YELINEK has a license.

76. On April 16, 2017, YELINEK stated to Coleman when she gets out she will need at least one or two people to herself. Coleman talked about four women who either are currently working for him or he talked to about working for him including "the one from the bus stop." YELINEK stated to Coleman, "Yeah. Of course, everything's popping off while I'm in here."

77. On April 19, 2017, YELINEK mentioned to Coleman that there is an inmate being held at the jail on human trafficking charges. Coleman asked YELINEK who is the person being held and YELINEK responds Tiana Lewis. Coleman wanted YELINEK to get "knowledge" from Lewis and try and build a relationship with her. YELINEK stated to Coleman, "Listen, I already tried to talk to her about it, and she's like trying to deny the shit like she didn't even have nothing to do with it, don't know what was going on."

78. On April 22, 2017, YELINEK told Coleman she has another potential. She told him she has a bail and goes on to describe what the woman looks like. "She's a little plump. She's probably like 180, 200. Blonde long hair, her face isn't bad. She's just a little bigger than



the girls we normally deal with. She looks like that would probably attract the older ones, you know what I mean?”

79. On December 1, 2017, YELINEK was returned to the Women’s Correctional facility in Chicopee, Massachusetts for violating her parole conditions. Parole reported YELINEK’s cell phone had text messages that indicated she may be involved in human trafficking and prostitution. She also had several motel room keys on her person, and she tested positive for narcotics.

80. The 2017 jail calls between Coleman and YELINEK about recruiting women in the jail for prostitution occurred after YELINEK had regularly transferred funds to Coleman via Paypal during 2016. The PayPal records are summarized below, and they indicate that the Coleman Enterprise accepted payments for commercial sex by PayPal (albeit a small percentage of the total) and that the proceeds of prostitution were transferred to Coleman’s PayPal account.

#### **Interviews of former Sex Workers**

81. On March 12, 2019, HSI Task Force Officer (TFO) Tara Kelliher and Special Agent (SA) Pete Olesen spoke with a witness (Witness 1) with knowledge of some of YELINEK’S activities working with women in the sex industry. Witness 1 stated that YELINEK was Coleman’s business partner from 2013 through 2016 and was also Coleman’s ex-girlfriend. Witness 1 stated that YELINEK would collect the money from the sex workers, explain the rules, keep the girls in line, drive the girls to and from dates and distribute the drugs. Witness 1 stated Coleman stated that YELINEK was a “monster” with making money.

82. On April 22, 2019, TFO Tara Kelliher and SA Michael Morizio spoke with a witness (Witness 3) with knowledge of some of YELINEK’S activities working with women in



the sex industry.

83. One day Witness 3 was at a location in Springfield and was feeling sick from a heroin withdrawal. Coleman approached her and asked if she was feeling alright. Witness 3 explained that she was sick, and Coleman took her to get a half bundle of heroin. Witness 3 could not remember where Coleman took her. He provided her with his phone number, and they remained in contact. Witness 3 would steal cosmetic products for Coleman to pay for her heroin. She would also receive cash from him instead of drugs if she asked for it.

84. One day Coleman proposed the idea of Witness 3 working for him instead of stealing. He told her that she was very attractive and could make a lot of money. Witness 3 accepted COLEMAN's proposal and worked as a prostitute for him in hotels for approximately six to seven months.

85. While working for Coleman, YELINEK would take photos of Witness 3 to post prostitution advertisements online. The photos were taken either at whatever motel she was staying at or at Coleman's house near Wheeler's Market. Witness 3 could not remember the address. Witness 3 did not remember what website the ads were posted to. Witness 3 primarily resided in either the Motel 6 or Red Roof Inn in Connecticut. The hotel was paid for by Coleman. Witness 3 did not have a car, and either Coleman or YELINEK would drive her. Both Coleman and YELINEK supplied her with drugs while she was living and working out of the hotels. They provided her with a cell phone but would arrange dates for her. Witness 3 would receive either a call or text from Coleman or YELINEK informing Witness 3 that she had a "date".

86. Coleman and YELINEK had set the prices for a "date" with Witness 3: She

could not remember exact prices but thought they were somewhere around \$150 for a quick visit and \$220 for an hour visit.

87. Coleman and YELINEK would supply condoms and needles. They also supplied clothing, primarily lingerie. Coleman had a "booster" named Rachael that stole clothes for him. Rachael worked for Coleman as a prostitute in addition to stealing for him.

88. Witness 3 was not allowed to keep any money she made. None of the girls were allowed to take any tips. All money was given to YELINEK, who would pick it up at the hotel. She drove a white sedan, possibly a Nisan Altima.

89. According to Witness 3, YELINEK also worked for Coleman as a prostitute but thought she was above the other girls and considered herself a partner with Coleman. Witness 3 recalled waiting outside of a hotel room one time while YELENIK did a "date" inside.<sup>6</sup>

90. Witness 3 stated that if business was slow, meaning she did not have any "dates", she was not given drugs. Additionally, there were consequences if one of the girls tried to quit working for Coleman and leave.

91. One time, Witness 3 tried to take her money and leave the Red Roof Inn in Connecticut. Coleman caught her and left her stranded in Connecticut for two weeks. Coleman threatened to have YELINEK come and "fuck her up." She also recalled Coleman telling her (Witness 3) that she had, "no idea who she was fucking with." Coleman took Witness 3's phone and clothes, and Witness 3 ended up getting kicked out of the hotel.

92. The telephone number (413) 930-5025 is listed in 61 advertisements from December 12, 2016 to December 26, 2016. The advertisements all show Witness 3, including

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<sup>6</sup> This investigation has not yielded any other information indicating that YELINEK ever performed commercial sex work.



her face.

93. All of the advertisements with the (413) 930-5025 telephone number contain pictures of “Witness 3” in sexually provocative poses and/or in a state of being partially clothed. The advertisements contain multiple photographs of Witness 3, and sometimes the photographs focus on a body part, such as the buttocks or the breasts.

94. The advertisements with telephone number (413) 930-5025 are directed to specific geographic areas with all or almost all of the advertisements split between the Springfield, MA and Hartford, CT markets. This indicates that “Witness 3” moved across state lines for servicing different commercial sex markets in Massachusetts and Connecticut.

95. On December 13, 2018, TFO Tara Kelliher and SA Pete Olesen spoke with a witness (Witness 4) with knowledge of some of YELINEK’S activities working with women in the sex industry. Witness 4 worked for YELINEK and Coleman in 2016. During this time YELINEK collected the money from prostitution, posted the pictures of Witness 4 and distributed drugs to Witness 4.

96. Witness 4 stated that one time YELINEK got mad at her for refusing to have unprotected anal sex and turning away a client with whom she (Witness 4) did not want to have sex. YELINEK told Witness 4 she could not turn away clients for these services because she (Witness 4) owed YELINEK and Coleman money.

**Preference for Cash in Sex Trafficking & Evidence of Transmission of Prostitution**

**Proceeds via Paypal from YELINEK**

97. While the commercial sex business operates largely on the basis of cash paid by the customer to the sex worker, there is evidence that the Coleman Enterprise solicited, on



occasion, payment from customers by PayPal and that the proceeds of prostitution were directed from YELINEK to Coleman through PayPal. The preference for cash in the commercial sex business is based on several factors. Individuals involved in illegal activity generally prefer to use cash because it is largely untraceable, and criminals wish to avoid detection. The use of cash allows the customer's payment to be used immediately for the purchase of goods and services, and other forms of payment often require the use of a bank account, which some people do not have. In addition, the customer, beyond avoiding criminal liability for purchasing sex, has an incentive to avoid potential embarrassment, and the untraceability of cash helps to keep the use of prostitute's secret.

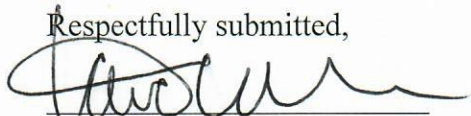
98. Emails produced by Google pursuant to a federal search warrant (18-MJ-3087-KAR) for the account williamj124@gmail.com included numerous emails documenting PayPal transactions in which YELINEK sent Coleman money.

99. PayPal records obtained pursuant to a Grand Jury subpoena also show that the PayPal account of YELINEK transferred \$6,731.99 to the PayPal account of William Coleman from January 2016 to January 2017.

### **CONCLUSION**

100. Based upon the foregoing, I respectfully submit that there is probable cause to believe that Shannon YELINEK committed the Subject Offenses.

Respectfully submitted,



Tara Kelliher  
Task Force Officer  
Homeland Security Investigations

Sworn and subscribed before me this 14<sup>th</sup> day of August, 2019.



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HONORABLE KATHERINE A. ROBERTSON  
United States Magistrate Judge